

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
NML CAPITAL, LTD.,	:
	:
Plaintiff,	: 03 Civ. 8845 (TPG)
	: 05 Civ. 2434 (TPG)
	: 06 Civ. 6466 (TPG)
-against-	: 07 Civ. 1910 (TPG)
	: 07 Civ. 2690 (TPG)
	: 07 Civ. 6563 (TPG)
	: 08 Civ. 2541 (TPG)
THE REPUBLIC OF ARGENTINA,	: 08 Civ. 3302 (TPG)
	: 08 Civ. 6978 (TPG)
	: 09 Civ. 1707 (TPG)
Defendant.	: 09 Civ. 1708 (TPG)
	:
-----X	
AURELIUS CAPITAL PARTNERS, LP	:
and AURELIUS CAPITAL MASTER, LTD.,	:
	:
Plaintiffs,	: 07 Civ. 2715 (TPG)
	: 07 Civ. 11327 (TPG)
-against-	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
	:
-----X	
BLUE ANGEL CAPITAL I LLC,	:
	:
Plaintiff,	: 07 Civ. 2693 (TPG)
	: 10 Civ. 4101 (TPG)
-against-	: 10 Civ. 4782 (TPG)
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
	:
-----X (captions continue on following page)	

**DECLARATION OF ELIZABETH M. HANLY IN OPPOSITION TO
PLAINTIFFS' MOTIONS FOR DISCOVERY SANCTIONS**

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AURELIUS OPPORTUNITIES FUND II, LLC	:	
and AURELIUS CAPITAL MASTER, LTD.,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	10 Civ. 1602 (TPG)
	:	10 Civ. 3507 (TPG)
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----	X	

AURELIUS CAPITAL MASTER, LTD. and	:	
AURELIUS OPPORTUNITIES FUND II, LLC,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	10 Civ. 3970 (TPG)
	:	10 Civ. 8339 (TPG)
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----	X	

AURELIUS CAPITAL MASTER, LTD. and	:	
ACP MASTER, LTD.,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	09 Civ. 8757 (TPG)
	:	09 Civ. 10620 (TPG)
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----	X	

Pursuant to 28 U.S.C. § 1746, Elizabeth M. Hanly declares as follows:

1. I am an attorney admitted to practice before this Court and an associate at Cleary Gottlieb Steen & Hamilton LLP, counsel for defendant the Republic of Argentina (the “Republic”) in these matters. I submit this declaration on behalf of the Republic in opposition to plaintiffs’ motions for discovery sanctions.

2. Attached to this declaration as Exhibits A-R are true and correct copies of the following documents:

<u>Ex.</u>	<u>Document</u>
A	Letter from K. Bresnahan to R. Cohen and E. Friedman (July 15, 2015);
B	Letter from W. Dahill and C. Clark to Judge Griesa, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 08 Civ. 6978 (TPG) (S.D.N.Y. July 6, 2015);
C	Letter from P. Zimmerman to Judge Griesa, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 08 Civ. 6978 (TPG) (S.D.N.Y. July 6, 2015);
D	Letter from S. Tountas to D. O’Gorman (May 28, 2015);
E	Letter from J. Stecher to D. O’Gorman (May 28, 2015);
F	NML Subpoena Duces Tecum to Tannenbaum Helpert Syracuse & Hirschtritt LLP, May 7, 2015;
G	NML Subpoena Duces Tecum to Bleichmar Fonti Tountas & Auld LLP, May 7, 2015;
H	Email from C. Boccuzzi to R. Cohen (Feb. 18, 2015);
I	Email from R. Cohen to C. Boccuzzi (Feb. 17, 2015);
J	Letter from C. Boccuzzi to R. Cohen (Jan. 30, 2015);
K	Letter from R. Cohen to C. Boccuzzi (Jan. 23, 2015);
L	Order, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 14 Misc. 1237 (RCL) (D.D.C. Nov. 6, 2014);
M	Email from K. Bresnahan to D. Rapport (July 15, 2013);

- | <u>Ex.</u> | <u>Document</u> |
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| N | Plaintiffs' Discovery Requests to Defendant the Republic of Argentina, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. June 13, 2013); |
| O | Republic of Argentina's Responses and Objections to Plaintiff's Interrogatories and Document Requests, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 03 Civ. 8845 (TPG) (S.D.N.Y. Sept. 27, 2012); |
| P | Plaintiff's Discovery Requests to Defendant the Republic of Argentina, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 03 Civ. 8845 (TPG) (S.D.N.Y. Aug. 14, 2012); |
| Q | Plaintiffs' Requests for Production to Defendant, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011); |
| R | Letter from C. Boccuzzi to Judge Griesa, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. May 29, 2009). |

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 17, 2015, in New York, New York.



ELIZABETH M. HANLY